

AFFIDAVIT

I, Gina M. Galantino, being duly sworn, state as follows:

INTRODUCTION

1. I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I am a Special Agent with the Bureau of Alcohol Tobacco Firearms and Explosives (ATF) and have been so employed since 2020. I am currently assigned to the Boston Field Office.

2. I am a graduate of the Federal Law Enforcement Training Center. I have participated in surveillance and interdiction operations at known drug locations and have made numerous arrests for drug related crimes. I have further received training in firearms trafficking and the diversion of legal firearms for unlawful purposes and made numerous arrests for firearms and violent offenses.

3. I submit this affidavit in support of the government's motion that ERIC CORREIA, a/k/a "Bubba," KENNY ROMERO, a/k/a "KG," and PAULO SANTOS, a/k/a "Bucky," be detained pending trial. Each has been identified as a member of Cameron Street, a violent Boston gang. Each has participated in acts of violence in support of Cameron Street and / or distributed firearms or narcotics that help fund the Cameron Street enterprise.

4. This affidavit is based on my participation on this investigation, my discussions with other agents and law enforcement officers, and my review of law enforcement reports and publicly available sources of information. This affidavit does not set forth all of my knowledge about CORREIA, ROMERO, and SANTOS or the Cameron Street gang.

5. Cameron Street. For decades, Boston has been plagued by violent crime committed

by certain street gangs that, while using different designations over time, have maintained a roughly consistent geographic area of concentration. One group is primarily based in Dorchester, Massachusetts, in the vicinity of Bowdoin Street and Geneva Avenue, and today is commonly referred to by law enforcement as “Cameron Street.” A second group is based on the Dorchester – Roxbury neighborhood line, separated by Columbia Road, a major Boston thoroughfare, and is known variously as “NOB,” for “Norton/Olney/Barry” Streets, or known more generally as “Wendover,” for “Wendover Street.”

6. Members of Cameron Street refer to themselves as such or use abbreviations such as “Cam,” “C,” “Camily,” “Killa Cam,” and “Body Bag Boys” to describe the gang. Some members of the gang mark their bodies with distinguishing tattoos or wear logos for sports teams that feature the letter “C,” including the Chicago Cubs, the Cleveland Guardians (formerly known as the Cleveland Indians) or the Cincinnati Reds of Major League Baseball or the National Hockey League’s Calgary Flames or Montreal Canadiens. Members of Cameron Street also feature “KC” (from Major League Baseball’s Kansas City Royals), meant to signify “Killa Cam.” Members obtain and display jewelry or other items marked with “3-1-1-3,” which refers to the third, first, and thirteenth letters of the alphabet (“C,” “A,” “M”). Members often use three fingers (for “C”) to identify themselves as members of the gang.

7. Based on the investigation to date, confidential sources of information, personal admissions of affiliation, and publicly available social media images and videos, I believe that Cameron Street operates in Boston and surrounding communities and that members perpetrate acts of violence – including murder, attempted murder, armed robbery, home invasions, and carjackings – to enhance the status and power of Cameron Street. Members of Cameron Street regularly post videos or use social media applications to promote Cameron Street, celebrate

murders and other violent crimes committed by Cameron Street, and denigrate gang rivals, in particular NOB/Wendover.

8. The Cameron Street Investigation. As part of this investigation, agents have received information from a cooperating witness (CW-1) who is a member of Cameron Street and who is able to associate with many of its members. CW-1 has provided information concerning the origin and development of Cameron Street along with its rules and structure. CW-1 identified CORREIA by name and by his gang nickname of “Bubba,” identified ROMERO by name and by his nickname of “KG,” and identified SANTOS by name and by his nickname of “Bucky.” CW-1 identified all three as members of Cameron Street.

9. Agents have corroborated CW-1’s identifications through a variety of methods. In the past five years, Boston Police officers have stopped or observed CORREIA in the company of Cameron Street members, including co-defendants ROMERO, ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze” (generally considered to be the leader of Cameron Street who is alleged to have distributed or possessed firearms and large quantities of cocaine, cocaine base, and methamphetamine during the investigation), CHAROD TAYLOR, a/k/a “Pachino” (multiple drug distribution convictions who is alleged to have distributed cocaine and cocaine base during the investigation), CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo” (who appears in a Cameron Street rap video where he re-enacts a gang shooting and who is alleged to have committed a home invasion and robbery of a drug dealer with another Cameron Street member), KEIARRI DYETTE, a/k/a “Kemo” (who has several Cameron Street tattoos, allegedly pistol-whipped a Wendover gang member, and sold several firearms during the investigation), as well as KENNETH ARAUJO, a/k/a “Horse,” a Cameron Street member who, along with SANTOS, assaulted and robbed a Wendover gang member outside Dorchester District Court and who was

recently charged with being a felon in possession of a firearm and ammunition. In addition to CORREIA, in the past five years, ROMERO has been observed with Cameron Street members several times, including with co-defendants CHAROD TAYLOR and CLAYTON RODRIGUES.

10. CORREIA has a tattoo of the Montreal Canadiens hockey team logo, a large “C,” on his right hand (he also has a small “c” tattooed by his left eye):



Cameron Street members also sometimes refer to themselves as being part of “Killa Cam” and “Body Bag Boys.” In January 2022, CORREIA’s birthday cake (posted to Facebook) included a reference to “Eric Snoww,” his vanity name on the public-facing portion of his Facebook page, as well as a reference to “3113” (for “CAM”) and “Body Bag Boyz”:



11. SANTOS has a number of tattoos on his chest, including a tattoo for “KC,” for

“Killa Cam.” ROMERO, too, has a “3113” (for “CAM”) tattoo on his arm:



12. In addition to tattoos and articles of clothing designating membership in Cameron Street, agents have reviewed dozens of rap videos and recordings from Cameron Street members. One video where CORREIA is the featured performer is a July 2019 video entitled “Fuck the Opps,” a reference to all of Cameron Street’s “opposition,” but the video clearly identified NOB as Cameron Street’s principal rival. The video also includes appearance from other Cameron Street members, including ROMERO, ARAUJO, and co-defendant DEVANTE LOPES, a/k/a “D-Lopes.” Cameron members flash large sums of cash and flash Cameron Street three finger “C” gang hand signs toward the camera. Members make firearm trigger pull gestures and describe being armed with Glocks (“Glicks,” “Glizzies”), Berettas, and more generally “sticks” (firearms). The lyrics discuss the death of a tattoo of a deceased Cameron Street member and make reference to “NOBK,” which I believe means “NOB Killas.” Among the recent murders suspected of being connected to the Cameron Street – NOB/Wendover feud is the December 1, 2017 murder of NOB/Wendover member Natalio Gones, who was shot and killed in front of Peguero’s Market at 218 Bowdoin Street in Dorchester. At one point, CORREIA raps:

*Smoke him in a blunt, now he layin’ six feet [under]
Cuz that’s [unintelligible] body bag boys, bitch [we] stay on backs
Smokin’ mad Nat, he ain’t comin’ back
.40 hit his head, he turned into a pack*

13. Based on my training and experience, my work on this investigation, and my discussions with other agents, I believe that it is a common sign of disrespect to name a murdered gang rival as a type or grade of marijuana to smoke, so “Smokin’ mad Nat” is a way for Cameron Street to claim responsibility for Gomes’s murder.

14. CORREIA’s Participation in the Cameron Street Enterprise. Through this investigation, agents have learned that CORREIA has been convicted of an assault on a Wendover Street member outside Suffolk Superior Court and has been charged with a series of serious, violent crimes committed with other Cameron Street members or involving violence committed against Wendover Street (all of which is now incorporated into the racketeering conspiracy count set out in Count Two of the Superseding Indictment). While on pre-trial release for these offenses, on March 11, 2022, agents utilized CW-1 to make a videotaped controlled purchase of \$1,400 worth of marijuana from CORREIA.

15. The carjacking/shooting. On September 30, 2017, at 4:52 a.m., officers responded to a 911 call at 24 Howe Street, off of Cameron Street. When they arrived they spoke to Victim No. 1 on the front porch of his residence. Officers saw lacerations to Victim 1’s face and he had a broken nose. Victim No. 1 advised he was “ripped” out of his vehicle and beaten up by two unknown black males. The men stole car – a black Acura TL – as well as his wallet and work boots and drove over Victim No. 1 foot as they got away. Victim No. 1 testified in the grand jury about the assault consistent with the information he provided police but never made a positive identification of his assailants.

16. On October 2, 2017, at approximately 3:12 p.m., Boston Police officers responded to a shots fired on Harlow Street in Roxbury. Officers observed a red Honda Accord parked on the

street with bullet damage and observed a shell casing on the street next to the car. Officers spoke to Victim No. 2, a Wendover Street member, who said he was seated in the driver's seat when someone in a black Acura pulled up next to him and fired one shot out the passenger side window as Victim No.2 opened his driver's side door. The Honda was parked in front of the residence of one of the leaders of Wendover Street, who is the brother of Victim No. 2.

17. Detectives reviewed surveillance camera footage from the area and observed a black Acura fleeing from the scene of the shooting seconds after a gunshot can be heard. From a different surveillance camera, detectives saw the Acura arrive at Wayland Street and saw the passenger, wearing gray sweatpants, red sneakers, and a dark colored hooded sweatshirt, get out and enter 75 Wayland Street, approximately 10 minutes after the shots fired call. A short time later, the Acura was located unoccupied at 14 Cunningham Street, around the corner from Wayland Street. Surveillance footage shows the driver, wearing a black hooded sweatshirt, black sweatpants with a white stripe, and white sneakers, parked the Acura and run back to 75 Wayland. Twelve minutes later both men leave 75 Wayland, no longer wearing hooded sweatshirts.

18. Officers spoke to the homeowner at 75 Wayland who said that her "nephew," who she calls "Bubba" (CORREIA) had just come to her house came by a back door and then left through the front door. She allowed officers to enter her home to check and see if the suspects were there. Offices observed two black hooded sweatshirts from the third floor porch that were warm to the touch. The sweatshirts were photographed and logged into evidence. The homeowner eventually identified CORREIA before a state grand jury as the individual who came to her house shortly after the shooting. The Acura was towed. Pursuant to an inventory search, officers seized a loaded Smith and Wesson magazine from the passenger side floor of the car.

19. Detectives circulated still images from the surveillance video of the driver of the Acura as he ran back to Wayland Street and several Boston Police officers identified the driver and subsequently arrested him. Post-Miranda, the driver initially claimed to have worked all day on the day of the shooting but later asked to speak to investigators again. During the second recorded interview, the driver identified CORREIA as the passenger and shooter. The driver could not remember the name of the street where the shooting took place but described landmarks that were consistent with the scene of the shooting. The driver asked detectives if they had found the magazine in the car because after CORREIA fired, the clip had fallen from the gun. The driver also said that before the shooting he and CORREIA had driven down Wendover Street and pointed the gun at a different person but did not shoot. The driver also admitted that he was with CORREIA on September 29, 2017 when CORREIA took Victim No. 1's car by force. Both sweatshirts were examined by a Boston Police criminalist. Detectives were able to link DNA from the sweatshirts to CORREIA and the driver.

20. The First Robbery. On July 4, 2018, CORREIA, a second man, and a female accomplice committed an armed robbery at gunpoint and assault and battery upon Victim No. 5. As the female accomplice lured Victim No. 5 to 14 Pearl Street to "hang out," CORREIA approached Victim No. 5, displayed a firearm, said, "Give me everything you got on you," and struck Victim No. 5 on the back of the head with the firearm. Victim No. 5 said CORREIA and the other Cameron Street member stole his black iPhone 8 from his person, a Rolex watch, and his car keys. CORREIA and the other Cameron Street member attempted to gain entry to his vehicle but discovered the key fob battery was dead. CORREIA struck him in the head again with the firearm and the suspects collectively instructed Victim No. 5 to open the car door or they would shoot him. Upon accessing his vehicle, the suspects went through the vehicle, glovebox and trunk,

but did not steal the car as they apparently did not know how to drive a manual transmission vehicle. Victim No. 5 was shown a photo array by a blind administrator and identified CORREIA as one of the armed suspects who had struck him with the firearm.

21. The Second Robbery. On July 20, 2019, at about 8:10 p.m., two Boston Police officers responded to a call for an armed robbery at Hancock and Howe Street in Dorchester (in Cameron Street territory). When they arrived, they spoke to Victim No. 6, who said he had been robbed on top of the stairs on Downer Avenue with a firearm by two men who he knew: CORREIA and a second Cameron Street member. Victim No. 6 told officers that CORREIA had fled up Howe Street. Officers were able to locate and detain CORREIA and Victim No.6 identified him as one of the two men who robbed him. Victim No.6 showed the officers (later photographed and introduced as grand jury exhibits) Facebook messages from the day of the robbery between the victim and CORREIA, whose Facebook account included numerous photographs of himself under the name, “Eric Snoww.” From the text exchange, it appears that Victim No. 6 initially intended to purchase marijuana from Cameron Street member and co-defendant DEVANTE LOPES (referred to in the exchange as “Dlopes”) and LOPES arranged for the victim to purchase from CORREIA. In the exchange, Victim No. 6 ordered four ounces of marijuana from CORREIA for \$450 (in the text exchange) and they arranged to meet “up the steps” which are stairs that connect Downer Avenue to Hancock Street.

22. When Victim No. 6 arrived at the meeting location, CORREIA got into the back seat of his car, put a gun to his head, reached over to pull the keys out of the ignition, and said, “give me the money or I’ll blow your head off.” The victim saw CORREIA with “a black gun. Small and stuff.” CORREIA said, “You know what’s up, the time we on.” With a second Cameron Street member at the car with a gun, CORREIA told Victim No. 6, “Give me the stuff you have” and

took the \$450 that Victim No. 6 brought to buy the marijuana and the victim's Rolex watch. CORREIA was arrested on scene. Detectives reviewed surveillance footage from the area of Downer Avenue. While the video does not capture the meeting between CORREIA, the second Cameron member, and Victim No. 6, it does capture images that agents believe to be CORREIA and the second Cameron member close by Victim No. 6's location at the time of time of the robbery (when he is arrested, CORREIA is wearing the same clothes as he is in the video images). It also captured images of the second Cameron Street member clutching the right side of his waist, as if he is holding a gun.

23. CORREIA Assaulted a Wendover Member. On December 9, 2019, CORREIA and a second Cameron Street member assaulted a Wendover gang member outside Suffolk Superior Court. During the investigation officers located a video of the incident and from the video identified CORREIA and several other men who punched and kicked the Wendover member to the ground. CORREIA pleaded guilty to assault and battery with a dangerous weapon and assault and battery in connection to this attack and received a time-served sentence (132 days) and one year probation.

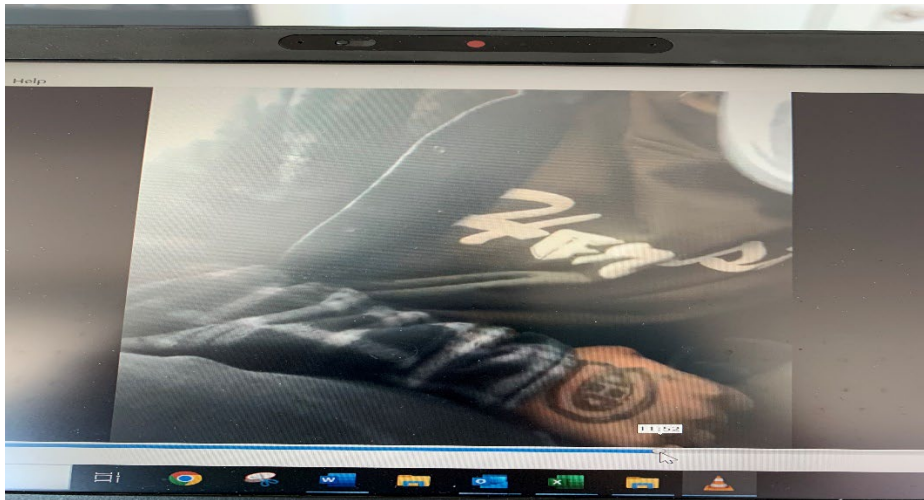
24. The Marijuana Sale. More recently, agents utilized CW-1 to conduct a videotaped controlled purchase of approximately three hundred and eleven grams of marijuana from CORREIA. On March 8, 2022, CW-1, who has known CORREIA for years, contacted CORREIA by phone and arranged to purchase one quarter pound of marijuana for \$1,400. The phone number used to contact CORREIA was subscribed to "Erica Correia" at an address in Connecticut. CORREIA told CW-1 to meet him the next day at CORREIA's residence at 114 Hancock Street, Apartment 1 in Dorchester, to complete the transaction.

25. On March 9, 2022, agents searched CW-1 and CW-1's vehicle, provided CW-1 with funds to purchase the drug evidence, and equipped CW-1 with an audio-video recording device. On the way to Hancock Street, CORREIA called to inform CW-1 that he was not at his residence and told CW-1 to meet him at 20 Saxton Street in Boston. When CW-1 arrived on Saxton Street, CW-1 called CORREIA, who advised CW-1 that he was on Saxton Street in a gold Honda Accord with Rhode Island plates. CW-1 observed CORREIA in a gold Honda Accord bearing Rhode Island registration 4157163. CORREIA eventually entered CW-1's car and told CW-1 that he was waiting for a third party to arrive to unlock the door to 20 Saxton Street to obtain marijuana to sell to CW-1. While waiting, CORREIA and CW-1 had an extended discussion about how CORREIA had recently been taken off a bracelet on his state case and how he was no longer able to stay at his former address because it was being renovated. CORREIA told CW-1 that he arranged to purchase marijuana on Saxton Street because he could not go to Hancock Street due to "the shit with Phil." I believe this is a reference to a February 26, 2022 incident at 72 Hancock Street by Cameron Street member FELISBERTO LOPES, a/k/a "Phil," a/k/a "CheeB," who shot an individual who broke into LOPES's apartment and attempted to take a large amount of cocaine and money from LOPES.

26. Moments later, an unidentified female arrived in a grey Honda Accord bearing Massachusetts registration 1TSZ79. CORREIA got out of CW-1's car, went inside 20 Saxton Street with the female, and returned to CW-1's car carrying a large bag. Once in the car, CORREIA handed CW-1 the bag, which contained 29 packages of marijuana weighing approximately 311 grams, and CW-1 handed CORREIA \$1,400 in government funds.



27. While CORREIA was wearing a facemask during the meeting, the video recording captured an image of his Cameron Street tattoo on his hand:



28. ROMERO's Participation in the Cameron Street Enterprise. Aside from CW-1's identification of ROMERO as a Cameron Street member, ROMERO has the "3113" Cameron Street tattoo, has been stopped and interviewed with numerous Cameron Street members over the past five years, and is featured in several Cameron Street rap videos (including ERIC CORREIA's "fuck the opps" video discussed above which promotes violence against NOB/Wendover).

29. ROMERO was sentenced to 21 months in prison and is still on supervised release

after his 2019 conviction in U.S. District Court in Boston for interstate transportation of a firearm, in violation of 18 U.S.C. § 922(a)(3). See United States v. Romero, Cr. No. 19-10330-GAO. In that case, a Boston Police officer recovered a gun, oxycodone, marijuana, and a scale from ROMERO during a car stop. A ballisticsian with the Boston Police Firearms Analysis Unit determined via testing that the gun seized from ROMERO had been used in a shooting on December 21, 2016 and an ATF investigation identified a straw purchaser in Virginia who helped ROMERO acquire the gun.

30. Agents utilized CW-1 to make six controlled purchases from ROMERO, three for controlled substances (marijuana, cocaine base, and crack cocaine), and three for a total of six firearms and one assault rifle. CW-1 typically communicated with ROMERO over Snapchat (ROMERO's Snapchat username is "KennyRoseRomero"). Several of the controlled purchases took place after August 21, 2021, when Boston Police officers seized cocaine and phones from ROMERO (a seizure which now forms the basis of Count One of the Superseding Indictment), where ROMERO was initially charged and released on bail in state court.

31. A chart summarizing the controlled purchases is set out here:

| Date | Location | How Obtained | Seller | Drug Exhibit |
|---------|---|---|--------------------------|---|
| 6/29/21 | Kia K5 rental car rented to ROMERO parked on Howe Street, Boston, Massachusetts | CW-1 via Snapchat "KennyRose Romero" | KENNY ROMERO, a/k/a "KG" | Approx. 100 grams or a quarter pound of marijuana in exchange for \$550 |
| 7/8/21 | CW-1's vehicle, 53 Arthur Street, Quincy, Massachusetts | CW-1 via Snapchat "KennyRose Romero" | KENNY ROMERO, a/k/a "KG" | Approx. 42 grams or one and one-half ounces of cocaine base (field test positive) in exchange for \$2250 and 11 grams marijuana from prior deal |
| 8/21/21 | Toyota Camry operated by Pedro Daveiga, Eustis Street, Boston, Massachusetts | Traffic stop / arrest by Boston Police Department | KENNY ROMERO, a/k/a "KG" | Approx. 22 grams of cocaine (field test positive) and two cell phones |

| Date | Location | How Obtained | Seller | Drug Exhibit |
|----------|---|--|--------------------------|---|
| 9/14/21 | CW-1's vehicle, parked near 69 London Street, East Boston, Massachusetts | CW-1 via Snapchat: "KennyRose Romero" | KENNY ROMERO, a/k/a "KG" | Approx. 28 grams or one ounce of cocaine (field test positive) in exchange for \$1,350 |
| 9/21/21 | CW-1's vehicle, parked near 27 Liverpool Street, East Boston, Massachusetts | CW-1 via Snapchat: "KennyRose Romero" | KENNY ROMERO, a/k/a "KG" | Bersa .380 caliber semiautomatic pistol bearing serial number K64838 loaded with six rounds of .380 caliber ammunition and Girsan Regard MC 9 millimeter semiautomatic pistol bearing serial number T6368A00774 loaded with seven rounds of 9 millimeter ammunition in exchange for \$3,100 |
| 10/13/21 | ROMERO's grey Nissan Sentra, parked at Home Depot parking lot, Chelsea, Massachusetts | CW-1 via Snapchat: "KennyRose Romero" and cell: 339-213-9996 | KENNY ROMERO, a/k/a "KG" | Smith and Wesson .44 caliber revolver bearing serial number 5X391 and F.N. Herstal 9 millimeter semiautomatic pistol bearing serial number 46557 in exchange for \$2,700 |
| 10/27/21 | 61 Yale Street, Springfield, Massachusetts CW-1's vehicle, parked at Home Depot, Somerville, Massachusetts | CW-1 via cell: 339-213-9996 | KENNY ROMERO, a/k/a "KG" | SCCY model CPX-2 9 millimeter semiautomatic pistol bearing serial number C077414, Ruger model ECS9s 9 millimeter pistol bearing serial number 458-59438, Windham Weaponry model WW-15 .233 rifle bearing serial number WW137377 in exchange for \$4,100 |

32. During these controlled purchases, ROMERO was identified by CW-1 as well as by agents, either while on surveillance or by viewing the video recording of the controlled purchase. For instance, this is still image from the video of the controlled purchase of a firearm on September 21, 2021, when ROMERO sold two firearms to CW-1, and a photograph of one of the two guns purchased from him:



33. Before ROMERO was arrested federally on the Boston Police cocaine seizure (which eventually became Count One of the Superseding Indictment), agents applied for and were granted search warrants to search the iPhones seized from him at the time of his Boston Police arrest. A review of the data extracted from the phones is ongoing but even a preliminary review of the data showed that ROMERO was regularly involved in distributing cocaine, crack cocaine,

marijuana, Adderall, and Percocet and other controlled substances with multiple customers while on supervised release. For instance, data from one of ROMERO's phones includes a lengthy exchange between ROMERO and a drug purchaser. On January 25, 2021, the drug purchaser texted ROMERO, "Can you come by here. I got 130." ROMERO responded, "Yeah, what did you want to grab," and the drug customer responded, "I got 130 for brown," which is a common street term for heroin and/or a heroin-fentanyl mixture. On February 10, 2021, ROMERO and the same drug customer had a lengthy exchange. ROMERO texted the drug purchaser, "Can't do 150 for 2 gs of the soft? It'll be cheaper instead of getting 1 for 100," and the customer responded, "OK." ROMERO replied, "300 is for the brown the soft is aside correct" ("soft" is a common street term for cocaine). At 10:40 a.m., the drug customer directed ROMERO to a specific residence in Wakefield, Massachusetts and then texted ROMERO, "150 soft 300 on the other." At approximately 10:53 a.m., ROMERO replied, "Got you. 30 min." Three hours later, at approximately 1:30 p.m., ROMERO texted the drug customer to ask about the drugs: "Was good?" The drug customer responded, "It's okay. I mean I don't want to lie to you about it. It gets me off e [sic]. The coke is great it just has a little too much cut." ROMERO concluded the exchange that day by telling the customer, "I actually do have some better stuff a lot less cut."

34. ROMERO and the drug purchaser remained in regular contact. For instance, on July 26, 2021, ROMERO texted the drug customer to inform him, "Doing basket deals today 220" ("basket" is a common street term for 3.5 grams of cocaine). The drug purchaser replied to ROMERO, "Can you come by for 100," a request for ROMERO to deliver \$100 worth of cocaine instead of the larger quantity offered. ROMERO told the drug purchaser he had arrived at the purchaser's house: "Outside. Silver Nissan." On August 10, 2021, ROMERO and the drug purchaser exchanged similar messages to complete a nearly-identical cocaine deal for \$100.

35. On August 21, 2021, at 2:40 p.m., ROMERO texted the drug purchaser, “Got some new fire” with a fire emoji in the text message and told the customer, “Hit me up.” At 5:00 p.m., less than two and a half hours after sending this text, Boston Police officers pulled over the Toyota Camry and seized the bag of cocaine from ROMERO. There were several similar text threads between ROMERO and other customers.

36. A photograph of the firearms and assault rifle sold to CW-1 by ROMERO on the last controlled purchase made from him on October 27, 2021 is below:



37. SANTOS’s Participation in the Cameron Street Enterprise. As noted above, CW-1 identified SANTOS as a member of Cameron Street and agents have determined that SANTOS has a “KC,” for “Killa Cam,” tattoo. On December 6, 2019, SANTOS and ARAUJO, as noted above another Cameron Street member recently charged with being a felon in possession of a firearm, chased down Victim No. 7, a Wendover Street gang member, outside of Dorchester District Court, assaulted him, and took his shoes. Later that day, Boston Police officers saw that ARAUJO posted a video of the attack to his Snapchat account. SANTOS shouted to ARAUJO, “What’s that, a ‘dub’ (for “W” or Wendover) nigga running? Get him, Horse!” (ARAUJO’s gang name). The next video clip shows ARAUJO standing over Victim No. 7 and repeatedly punching

Victim No. 7 in the face as the victim tries to shield his face with his hands. ARAUJO also posted a caption over the video which said, “Happy feet, this happy feet, that man’s just run out of his feet.” Later that evening, ARAUJO posted another video where he held one of Victim No. 7’s sneakers in his hand and said that he was trying to get rid of the sneaker.


38. After a state grand jury investigation, on February 12, 2020, ARAUJO and SANTOS were each indicted for assault and battery and unarmed robbery. On February 13, 2020, officers executed arrest and search warrants for both SANTOS and ARAUJO. At the time, SANTOS lived at 107 HMS Fitzroy Drive, Apartment 201, in Hingham. Officers knocked and announced and a man behind the door claimed he was on his way to open the front door. When the door did not open, officers breached the door and found SANTOS inside the apartment. SANTOS was provided Miranda warnings and shown a copy of the search warrant. Post-Miranda, SANTOS told officers that he had a gun in his bedroom closet. Officers recovered the following:

- A Smith and Wesson .38 caliber revolver bearing serial number CPP6673 containing 5 rounds of .38 caliber ammunition in a gray case in the bedroom closet. While the gun was manufactured in Massachusetts it was reported stolen out of Maine in 2016;
- A shoe box containing approximately 900 grams of cocaine (drug cert completed by Massachusetts State Police lab);
- Approximately 500 grams of marijuana (drug cert completed by Massachusetts State Police lab);
- \$15,597 in cash, either in a shoe box in the bedroom closet (\$15,000), or SANTOS’s wallet (\$485), or in a coffee jar (\$112);
- Hundreds of plastic bags, two scales, and dozens of empty marijuana dispensary zip lock marijuana bags.

39. Conclusion. For the reasons set out above, I believe that CORREIA, ROMERO, and SANTOS are members of Cameron Street, a violent street gang; that CORREIA and SANTOS have perpetrated acts of violence directed at rival gang members; that CORREIA, ROMERO, and SANTOS are in the regular business of trafficking in controlled substances; and that ROMERO is

regularly engaged in the business of acquiring and distributing firearms. I respectfully request that CORREIA, ROMERO, and SANTOS be detained pending trial.

Signed under the pains and penalties of perjury this 28th day of April 2022.



GINA M. GALANTINO
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives